

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Case No. 21-CV-4056
	)	
vs.	)	
	)	
BITCOIN TOKENS (0.57590834),	)	
CRYPTO.COM TOKENS (10,132.25996688),	)	
EJIN COIN TOKENS (5,000),	)	
ETHEREUM TOKENS (4.0064493),	)	
LISK TOKENS (600),	)	
BASIC ATTENTION TOKENS (500.00),	)	
GOLEM NETWORK TOKENS (1,750),	)	
KOMODO TOKENS (100) and	)	
MONACO TOKENS (10.43974202).	)	
	)	
Defendants.	)	

**MOTION TO FILE COMPLAINT UNDER SEAL**

The United States of America files this motion to seal its forfeiture complaint.

In support thereof, the United States states as follows:

1. The United States seeks to file today a Verified Complaint for forfeiture *in rem* against cryptocurrency seized from Jerad Colt Barnes.

2. In support of that complaint, the United States seeks to use two documents that are currently under seal, the plea agreement in *United States v. Barnes*, 5:20-cr-04027-LTS-KEM-1, United States District Court Northern District of Iowa and the seizure warrant, application and return entered in *In the Matter of the Seizure of Cryto.com account #560707 with at least 10 subwallets of several cryptocurrencies (totaling at last \$9,314 USD) in the name of Barnes Jared with the associated email address of [barnesjerad2@gmail.com](mailto:barnesjerad2@gmail.com)*., Case No. 20-mj-103 United

States District Court Northern District of Iowa.

3. The United States has filed motions with Court asking that the plea agreement and the seizure warrant, application and return be unsealed.

Until those motions are granted, because the verified complaint filed by the United States contains information that is sealed, the United States respectfully requests the Court seal this complaint and all documents filed with it until further order of the court.

Respectfully submitted,

SEAN R. BERRY  
United States Attorney

By: /s/ Martin J. McLaughlin

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